

# **EXHIBIT A**

Yongmoon Kim (NJ Atty. ID #026122011)  
KIM LAW FIRM LLC  
411 Hackensack Avenue, Suite 701  
Hackensack, New Jersey 07601  
Telephone & Fax (201) 273-7117  
ykim@kimlf.com  
*Attorneys for Plaintiff*

CAROLINA C. ZAMORA,  
*on behalf of herself and those similarly situated,*  
  
Plaintiff,  
  
vs.  
  
MIDLAND CREDIT MANAGEMENT, INC.,  
  
Defendant.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: ESSEX COUNTY

Civil Action

Docket No. ESX-L-4221-21

**SUMMONS**

From The State of New Jersey To The Defendant(s) Named Above:

The plaintiff, named above, have filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at [http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf).) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiffs' attorneys whose names and addresses appear above, or to plaintiffs, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiffs demands, plus interest and costs of suit. If

judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at [http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf).

Dated: June 3, 2021

/s/ Michelle M. Smith

Michelle M. Smith

Clerk of the Superior Court of New Jersey

Name of Defendant to be served:

**Midland Credit Management, Inc.**

Address of Defendant to be served:

**c/o Corporation Service Company  
Princeton South Corporate Center, Suite 160  
100 Charles Ewing Boulevard  
Ewing, New Jersey 08628**

Yongmoon Kim - 026122011  
KIM LAW FIRM LLC  
411 Hackensack Avenue, Suite 701  
Hackensack, New Jersey 07601  
Tel. & Fax (201) 273-7117  
ykim@kimlf.com  
*Attorneys for Plaintiff*

CAROLINA C. ZAMORA,  
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SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: ESSEX COUNTY

Docket No. ESX-L-\_\_\_\_\_

Civil Action

**CLASS ACTION COMPLAINT  
AND JURY DEMAND**

Plaintiff Carolina C. Zamora, individually and on behalf of those similarly situated, by way of Class Action Complaint against Defendant Midland Credit Management, Inc., states:

**NATURE OF THE ACTION**

1. This action for damages arises from the debt collector's violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. ("FDCPA").

**JURISDICTION AND VENUE**

2. This Court has jurisdiction to entertain this matter pursuant to 15 U.S.C. § 1692k(d) and 28 U.S.C. § 1331.

3. Venue in Essex County because Defendant regularly conducts business there, including the filing of collection actions against New Jersey residents.

**PARTIES**

4. Plaintiff Carolina C. Zamora ("Zamora" or "Plaintiff") is a natural person residing in Bergen County, New Jersey.

5. At all times relevant to this lawsuit, Plaintiff was a citizen of the State of New Jersey.

6. Defendant, Midland Credit Management, Inc. (“MCM”), is a Kansas corporation with its principal place of business located at 3111 Camino Del Rio North, Suite 103, San Diego, California, 92108.

7. Defendants John Does 1 to 10 are natural persons and/or business entities all of whom reside or are located within the United States and personally created, instituted and, with knowledge that such practices were contrary to law, acted consistent with and oversaw policies and procedures used by the employees of Defendant that are the subject of this Complaint. Those defendants personally control the illegal acts, policies, and practices utilized by Defendant and, therefore, are personally liable for all of the wrongdoing alleged in this Complaint. Those fictitious names of individuals and businesses alleged for the purpose of substituting names of defendants whose identity will be disclosed in discovery and should be made parties to this action.

8. Some or all of John Does 1-10 set the policies and practices complained of herein.

9. Some or all of John Does 1-10 were actively engaged in the practices complained of herein.

10. In this pleading, “Defendants” in the plural refers to all Defendants.

## **FACTS**

### **A. Corporate Background and Business Model**

11. Defendant is not in the business of extending credit, selling goods or services to consumers.

12. Defendant regularly collects or attempts to collect past-due and defaulted debts of natural persons allegedly owed to others which were incurred primarily for personal, family or household purposes.

13. Defendant is in the business of collecting past-due or defaulted debts or alleged debts of natural persons.

14. When attempting to collect debts, Defendant uses the mails, telephone, the internet and other instruments of interstate commerce.

15. Defendant has asserted that Plaintiff incurred or owed a certain financial obligation, which arose from one or more transactions which were primarily for Plaintiff's personal, family, or household purposes.

16. Defendant contends that the debt allegedly owed by Plaintiff was past-due and in default.

17. The alleged receivables associated with the debt was assigned to Defendant for the purpose of collection.

18. Plaintiff's alleged debt was past-due and in default when it was placed with or assigned to Defendant for collection.

19. Defendant is a collection agency.

20. Defendant is a litigious debt-buyer which purchases past-due and defaulted consumer debts for pennies on the dollar, and then attempts to collect those debts itself.

#### **B. The Capital One Account**

21. Based on Defendant's Letter, Defendant has asserted that Plaintiff incurred or owed a certain financial obligation arising from Capital One Bank (USA), N.A. ("Debt").

22. The Debt arose from one or more transactions which were primarily for Plaintiff's personal, family, or household purposes.

23. Due to unforeseen financial circumstances, Plaintiff could not make payments on the Debt.

24. Defendant later allegedly purchased a pool of defaulted consumer debts, including Plaintiff's Debt, for pennies on the dollar.

**C. Violations of the FDCPA—the Letters**

25. In an attempt to collect the Debt, MCM mailed a collection letter to Plaintiff on May 27, 2020 ("5/27/20 Letter"), and July 8, 2020 ("7/8/20 Letter").

26. A true but redacted copy of the 5/27/20 Letter, and the 7/8/20 Letter, along with the envelope, is attached as *Exhibit A*.

27. On information and belief, the Letters are mass-produced, computer-generated, form letters that are prepared by the Defendant and mailed to consumers in the State of New Jersey, such as Plaintiff, from whom they are attempting to collect a debt.

28. Plaintiff received and reviewed the 5/27/20 Letter and the 7/8/20 Letter.

29. MCM used the same procedures it used in sending the MCM Letters<sup>1</sup> to Plaintiff when sending the same and/or similar letters to numerous other New Jersey consumers.

30. During the proposed class period, MCM sent letters the same or similar to the MCM Letters to numerous New Jersey consumers in an attempt to collect a debt.

**D. Violations of the FDCPA—the Envelope**

31. The envelopes enclosing the MCM Letters ("Envelopes") included the words "TIME SENSITIVE DOCUMENT" (emphasis in original) in large, bolded font.

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<sup>1</sup> "MCM Letters" refers to the 5/27/20 Letter, and the 7/8/20 Letter.

32. “[T]here is no question that the language “TIME SENSITIVE DOCUMENT” appears on the envelope enclosing a communication to a consumer. It is equally apparent that the language at issue does not fall within the itemized exception set forth in subsection (8): It is not MCM’s name nor its address. The inclusion of this phrase thus violates § 1692f(8) . . . .” *Preston v. Midland Credit Mgmt.*, 948 F.3d 772, 784 (7th Cir. 2020).

33. Defendant has violated section 1692f(8) of the FDCPA as to the Plaintiff and the members of the Class hereinafter defined, by printing the phrase “TIME SENSITIVE DOCUMENT” on their envelopes.

34. It is Defendant’s policy and practice to mail collection letters in envelopes in an attempt to collect consumer debts to consumers in New Jersey that include language and symbols, other than the debt collector’s address such as printing the phrase “TIME SENSITIVE DOCUMENT.”

#### CLASS ACTION ALLEGATIONS

35. Plaintiff brings this action individually and as a class action on behalf of all others similarly situated pursuant to Rule 4:32.

36. The debts alleged to be owed by Plaintiff and those similarly situated were incurred for personal, family or household purposes.

37. Subject to discovery and further investigation which may cause Plaintiff to modify, narrow or expand the following class definition at the time Plaintiff moves for class certification, Plaintiff seeks certification of classes initially defined as follows:

**Class:** All natural persons with addresses within the State of New Jersey, to whom, from May 27, 2020, through the final resolution of this case, Defendant, sent one or more collection letters, including but not limited to letters in the form of Exhibit A to this complaint, in an attempt to collect a consumer debt, in an envelope marked with “TIME SENSITIVE DOCUMENT.”

38. Plaintiff seeks to recover statutory damages, actual damages, attorney's fees and costs on behalf of all class members under the Fair Debt Collection Practices Act.

39. The class for whose benefit this action is brought is so numerous that joinder of all members is impracticable.

40. There are questions of law and fact common to the members of the class that predominate over questions affecting only individuals, including but not limited to:

- A. Whether Defendant is a debt collector under the FDCPA;
- B. Whether Defendant violated 15 U.S.C. §§ 1692e, 1692e(2), 1692e(5), 1692e(10), 1692f and 1692f(8); ; and
- C. Whether Plaintiff and the class are entitled to statutory damages.

41. A class action is superior to other available methods for the fair and efficient adjudication of this controversy since joinder of all members is impracticable. The FDCPA statutory scheme provides for statutory damages payable to each member of the class. A class action will cause an orderly and expeditious administration of the claims of the class and will foster economies of time, effort and expense.

42. Plaintiff's claims are typical of the claims of the members of the class.

43. The questions of law and/or fact common to the members of the class predominate over any questions affecting only individual members.

44. Plaintiff does not have interests antagonistic to those of the class.

45. The class, of which Plaintiff is a member, is readily identifiable.

46. Plaintiff will fairly and adequately protect the interests of the class, and has retained competent counsel experienced in the prosecution of consumer litigation. Proposed Class Counsel have investigated and identified potential claims in the action; have a great deal of

experience in handling consumer class actions and other complex litigation, and claims of the type asserted in this action.

47. The prosecution of separate actions by individual members of the class would run the risk of inconsistent or varying adjudications, which would establish incompatible standards of conduct for the Defendant in this action or the prosecution of separate actions by individual members of the class would create the risk that adjudications with respect to individual members of the class would as a practical matter be dispositive of the interests of the other members not parties to the adjudications or substantially impair or impede their ability to protect their interests. Prosecution as a class action will eliminate the possibility of repetitious litigation.

48. Plaintiff does not anticipate any difficulty in the management of this litigation.

## **II. Count I - VIOLATIONS OF THE FDCA**

49. Plaintiff, on behalf of herself and others similarly situated, reasserts and incorporates herein the allegations contained in the preceding and following paragraphs.

50. Plaintiff and those similarly situated are “consumers” as defined by 15 U.S.C. § 1692a(3) because they are natural persons allegedly obligated to pay a debt, in which the money, property, insurance, or services, which was the subject of the transaction, was primarily for personal, family and/or household purposes.

51. The debts alleged to be owed by the Plaintiff and those similarly situated are consumer “debts” as defined by 15 U.S.C. § 1692a(5).

52. Defendant is a “debt collector” as defined by 15 U.S.C. § 1692a(6) and the interpretations thereof.

53. Defendant’s collection letter sent to Plaintiff and other New Jersey consumers are “communications” pursuant to 15 U.S.C. § 1692a(2).

54. By sending numerous collection letters in the same or similar form as Exhibit A, Defendant violated sections 15 U.S.C. §§ 1692e, 1692e(2), 1692e(5), 1692e(10), 1692f, and 1692f(8) of the FDCPA.

55. The violations of the FDCPA described herein constitute *per se* violations.

56. Based on any one or more of those violations, Defendant is liable to Plaintiff and those similarly situated for damages, attorney's fees and costs under 15 U.S.C. § 1692k.

#### **PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff Carolina C. Zamora, on behalf of herself and others similarly situated, demands judgment against Defendant MCM as follows:

- A. For certification of this instant matter as a class action, appointing the named Plaintiff as representative of the class, and appointing the attorneys of Kim Law Firm LLC as class counsel;
- B. For statutory damages in favor of Plaintiff pursuant to 15 U.S.C. § 1692k(a)(2)(B)(i) or, in the alternative, 15 U.S.C. § 1692k(a)(2)(A);
- C. For statutory damages in favor of the class pursuant to 15 U.S.C. § 1692k(a)(2)(B)(ii);
- D. For actual damages pursuant to 15 U.S.C. § 1692k(a)(1);
- E. For attorney's fees, litigation expenses and costs in connection with this action pursuant to 15 U.S.C. § 1692k(a)(3);
- F. For pre-judgment and post-judgment interest; and
- G. For such other and further relief as the Court deems equitable and just.

#### **JURY DEMAND**

Plaintiff demands trial by jury as to all claims and defenses.

**DESIGNATION OF TRIAL COUNSEL**

Plaintiff hereby designates Yongmoon Kim of the Kim Law Firm LLC as trial counsel in this matter.

**CERTIFICATION**

I hereby certify that confidential personal identifiers have been redacted from documents now submitted to the Court, and will be redacted from all documents submitted in the future in accordance with R. 1:38-7(b). I further certify that the causes alleged herein is not the subject of any other action pending in any Court or arbitration proceeding except the matter *Lerner v. Midland Funding, LLC*, 2:20-cv-07838-JMV-JBC (D.N.J.), which allege similar violations of the FDCPA based on Defendant's unlawful language on the envelopes. Furthermore, at this time, joinder of any additional parties is not necessary or anticipated to be necessary in the future.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

KIM LAW FIRM LLC

/s/ Yongmoon Kim  
Yongmoon Kim, Esq.  
*Attorneys for Plaintiff*

Dated: May 27, 2021

**WE'RE HERE  
TO HELP**

Carolina C. Zamora

Redacted

Redacted

|||||

P22 T587 021



|                              |                                 |
|------------------------------|---------------------------------|
| CAPITAL ONE BANK (USA), N.A. |                                 |
| Current Owner                | Midland Credit Management, Inc. |
| Original Account Number      | XXXXXXXXXXXX Redacted           |
| MCM Account Number           | Redacted                        |
| Current Balance              | \$3,331.00                      |

You are pre-approved for a 20% discount!

Reply Now! [MidlandCredit.com](http://MidlandCredit.com)

877-689-2027

Choose The Option That Works For You.

5/27/2020

RE CAPITAL ONE BANK (USA), N.A.

Dear Carolina,

We know times are tough. That's why we are offering you flexible options to stay on the road to financial recovery. We encourage you to take advantage of these generous options: pay TODAY at [MidlandCredit.com](http://MidlandCredit.com) or call 877-689-2027 now.

|   |  |
|---|--|
| Option 1: <b>Save 20%</b><br>This discount expires on 6/26/2020                                       | You Pay Only<br>\$2,664.80                               |
| Option 2: <b>Start Small</b><br>This offer expires 6-30-2020  | Pay as Little as \$5 per Month<br>for the First 3 Months |
| Option 3: <b>Let Us Know Your Status:</b><br>Call today to discuss your options and get more details. | Temporary Hardships<br>Available                         |

During times like these a single call can make a big difference. Call 877-689-2027 now. You can also learn more at [MidlandCredit.com](http://MidlandCredit.com).

Sincerely,

*Tim Bolin*

Division Manager

\*To take advantage of Option 1, log in to [MidlandCredit.com](http://MidlandCredit.com), choose "MAKE A PAYMENT" and follow the on-screen instructions. You may also call 877-689-2027.

\*\*Option 2 is only available by calling 877-689-2027.

**Flexibility  
You Need**

Defer Your Payments

Make Small Initial  
Payments (as low as \$5)

STOP our calls by selecting  
one of these 3 options

The 20% discount expires  
6/26/2020

(Other options available  
through 06-30-2020.)

[MidlandCredit.com](http://MidlandCredit.com)  
877-689-2027

Midland Credit Management, Inc.  
PO Box 301030  
Los Angeles, CA 90030-1030

001-17900



Midland  
Credit  
Management

350 Camino De La Reina  
Suite 100  
San Diego, CA 92108

We are not obligated to renew any offers provided.



[MidlandCredit.com](http://MidlandCredit.com)



877-689-2027



Midland Credit Management, Inc.  
PO Box 301030  
Los Angeles, CA 90030-1030

PLEASE SEE REVERSE SIDE FOR IMPORTANT DISCLOSURE INFORMATION

☐ Check here if you provided updated contact information on the reverse side.

MCM Account Number  
Current Balance

REDACTED  
\$3,331.00

Total Enclosed

\$



**Manage Your Account Online**  
[MidlandCredit.com](http://MidlandCredit.com)

**Important Payment Information**

Make checks payable to:  
Midland Credit Management  
Enter your MCM Account # on all payments

**877-689-2027**

Mail Payments to:  
Midland Credit Management, Inc.  
PO Box 301030  
Los Angeles, CA 90030-1030

se habla español  
877-689-2111

**EXHIBIT A**

REDACTED

Please understand this is a communication from a debt collector. This is an attempt to collect a debt. Any information obtained will be used for that purpose.

| Calls to and/or from this company may be monitored or recorded.                                     |  |   |                                 |
|---|--|---|---------------------------------|
| Basic Information   |  |   |                                 |
| Original Creditor   | CAPITAL ONE BANK (USA), N.A.   | MCM Account Number  | Redacted                        |
| Original Account Number   | XXXXXXXXXX Redacted  | Charge-Off Date   | 1/8/2020                        |
| Current Creditor<br><i>The sole owner of this debt</i>  | Midland Credit Management, Inc.  | Current Servicer  | Midland Credit Management, Inc. |
| Important Contact Information   |  |   |                                 |
| Send Payments to:<br>Midland Credit Management, Inc.<br>PO Box 301030<br>Los Angeles, CA 90030-1030 | Send disputes or an instrument tendered as full satisfaction of a debt to:<br>Attn: Consumer Support Services<br>320 E Big Beaver Rd.<br>Suite 300<br>Troy, MI 48083 | Physical Payments for Colorado Residents:<br>Colorado Manager, Inc.<br>8690 Wolff Court, Suite 110<br>Westminster, CO 80031<br>Phone (303) 920-4763 |                                 |

We are required under state law to notify consumers of the following additional rights. This list does not contain a complete list of the rights consumers have under applicable law:

NMLS ID: 934164

**IF YOU LIVE IN MASSACHUSETTS, THIS APPLIES TO YOU:** NOTICE OF IMPORTANT RIGHTS: You have the right to make a written or oral request that telephone calls regarding your debt not be made to you at your place of employment. Any such oral request will be valid for only ten (10) days unless you provide written confirmation of the request postmarked or delivered within seven (7) days of such request. You may terminate this request by writing to MCM.

**IF YOU LIVE IN NORTH CAROLINA, THIS APPLIES TO YOU:** North Carolina Department of Insurance Permit #101659, #4182, #4250, #3777, #111895, #112039, #113170, #113236 and #112678. Midland Credit Management, Inc. 350 Camino De La Reina, Suite 100, San Diego, CA, 92108

**IF YOU LIVE IN TENNESSEE, THIS APPLIES TO YOU:** This collection agency is licensed by the Collection Service Board of the Department of Commerce and Insurance.

DPRODA

By providing your telephone number below, you authorize MCM or its agents to contact you regarding your account at such number by any means, including calling, texting, using automated dialer systems and automatic telephone dialing systems, and using pre-recorded or artificial voice messages. By providing your e-mail address below, you agree to receive electronic mail communications from MCM or its agents regarding your account at such e-mail address and confirm that such e-mail address is not furnished or owned by your employer.

|                |                      |                      |                      |
|----------------|----------------------|----------------------|----------------------|
| Street Address | <input type="text"/> |                      |                      |
| City           | <input type="text"/> | State                | <input type="text"/> |
|                |                      | ZIP                  | <input type="text"/> |
| Email          | <input type="text"/> |                      |                      |
|                | Cell Phone           | <input type="text"/> |                      |
| Work Phone     | <input type="text"/> | Home Phone           | <input type="text"/> |

**EXHIBIT A**

PO Box 340  
Waite Park, MN 56387-0340

PRESORTED  
FIRST-CLASS MAIL  
U.S. POSTAGE  
PAID  
MCM

Carolina C. Zamora  
Redacted  
Redacted

P22 T587 021



**TIME SENSITIVE DOCUMENT**



**[EXHIBIT A]**



Midland  
Credit  
Management

350 Camino De La Reina  
Suite 100  
San Diego, CA 92108

Original Creditor

CAPITAL ONE BANK (USA), N.A.

Midland Credit Management, Inc. is a debt collection company.

7/8/2020

Carolina C. Zamora  
Redacted

P40 T1101 021



Redacted



Original Account Number

XXXXXXXXXXXX Redacted

MCM Account Number

Redacted

Current Balance

\$3,331.00

You are pre-approved for a

**10% discount!**

Reply Now [MidlandCredit.com](http://MidlandCredit.com) or call  
877-875-5578 by 8/7/2020

## Choose the Option That Works for You.

Midland Credit Management, Inc. gives you options to manage your account: make an online payment at [MidlandCredit.com](http://MidlandCredit.com) or call 877-875-5578. Whatever one you choose, we are offering you these fantastic savings below:

**OPTION 1**

**10% off**

**You Pay Only:**  
**\$2,997.90\***

Offer Expiration Date:  
8/7/2020

**OPTION 2**

**5% off**

6 Monthly Payments of  
**\$527.41\*\***

Total Payment Due (by 8/7/2020)

**Visit [MidlandCredit.com](http://MidlandCredit.com) or  
Call 877-875-5578 Now**

**ACCOUNT INFORMATION**

Current Owner:  
Midland Credit Management, Inc.

Original Account Number:  
XXXXXXXXXXXX840

MCM Account Number:  
857

Current Balance:  
\$3,331.00

Let's put this debt behind you. Visit [MidlandCredit.com](http://MidlandCredit.com), or call 877-875-5578 today, to pay off your account and regain your financial freedom!

Sincerely,

*Tim Bolin*

Division Manager

\*To take advantage of Option 1, log in to [MidlandCredit.com](http://MidlandCredit.com), choose "MAKE A PAYMENT" and follow the on-screen instructions. You may also call 877-875-5578.

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We are not obligated to renew any offers provided.

350 Camino De La Reina  
Suite 100  
San Diego, CA 92108

Visit [MidlandCredit.com](http://MidlandCredit.com) or Call **877-875-5578 Now**

Hours of operation: Mon-Fri: 8am - Midnight ET Sat-Sun: 8am - 7:30pm ET

PLEASE SEE REVERSE SIDE FOR IMPORTANT DISCLOSURE INFORMATION

☐ Check here if you provided updated contact information on the reverse side.

MCM Account Number  
Current Balance

Redacted  
\$3,331.00

Total Enclosed

\$



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**Important Payment Information**

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Midland Credit Management, Inc.  
PO Box 301030  
Los Angeles, CA 90030-1030

se hablé español  
877-875-5578

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|---|--|---|---------------------------------|
| Basic Information   |  |   |                                 |
| Original Creditor   | CAPITAL ONE BANK (USA), N.A.   | MCM Account Number  | Redacted                        |
| Original Account Number   | XXXXXXXXXXXX Redacted  | Charge-Off Date   | 1/8/2020                        |
| Current Creditor<br><i>The sole owner of this debt</i>  | Midland Credit Management, Inc.  | Current Servicer  | Midland Credit Management, Inc. |
| Important Contact Information   |  |   |                                 |
| Send Payments to:<br>Midland Credit Management, Inc.<br>PO Box 301030<br>Los Angeles, CA 90030-1030 | Send disputes or an instrument tendered as full satisfaction of a debt to:<br>Attn: Consumer Support Services<br>320 E Big Beaver Rd.<br>Suite 300<br>Troy, MI 48063.<br>You may also call: 877-875-5578 | Physical Payments for Colorado Residents:<br>Colorado Manager, Inc.<br>8690 Wolff Court, Suite 110<br>Westminster, CO 80031<br>Phone (303) 920-4763 |                                 |

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DPRODA →

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|                |                      |            |   |
|----------------|----------------------|------------|---|
| Street Address | <input type="text"/> |            |   |
| City           | <input type="text"/> | State      | <input type="text"/> ZIP <input type="text"/> |
| Email          | <input type="text"/> | Cell Phone | <input type="text"/>                          |
| Work Phone     | <input type="text"/> | Home Phone | <input type="text"/>                          |

**EXHIBIT A**

PO Box 340  
Waite Park, MN 56387-0340

PRESORTED  
FIRST-CLASS MAIL  
U.S. POSTAGE  
PAID  
MCM

7/8/2020

Carolina C. Zamora  
Redacted  
Redacted

P40 T1101 021



**TIME SENSITIVE DOCUMENT**



**[EXHIBIT A]**

## Civil Case Information Statement

**Case Details: ESSEX | Civil Part Docket# L-004221-21**

**Case Caption:** ZAMORA CAROLINA VS MIDLAND CREDIT  
MANAGEMENT, I

**Case Initiation Date:** 05/27/2021

**Attorney Name:** YONGMOON KIM

**Firm Name:** KIM LAW FIRM LLC

**Address:** 411 HACKENSACK AVE STE 701

HACKENSACK NJ 07601

**Phone:** 2012737117

**Name of Party:** PLAINTIFF : Zamora, Carolina, C

**Name of Defendant's Primary Insurance Company**  
(if known): Unknown

**Case Type:** COMPLEX COMMERCIAL

**Document Type:** NJ eCourts Case Initiation Confirmation

**Jury Demand:** YES - 6 JURORS

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

**Are sexual abuse claims alleged by: Carolina C Zamora?** NO

**THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE**

**CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION**

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** YES

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category: Putative Class Action?** YES **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

05/27/2021

Dated

/s/ YONGMOON KIM

Signed

ESSEX COUNTY - CIVIL DIVISION  
SUPERIOR COURT OF NJ  
465 MARTIN LUTHER KING JR BLVD  
NEWARK NJ 07102

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (973) 776-9300  
COURT HOURS 8:30 AM - 4:30 PM

DATE: MAY 28, 2021  
RE: ZAMORA CAROLINA VS MIDLAND CREDIT MANAG EMENT, I  
DOCKET: ESX L -004221 21

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 4.

DISCOVERY IS PRESUMPTIVELY 450 DAYS BUT MAY BE ENLARGED OR SHORTENED BY THE JUDGE AND RUNS FROM THE FIRST ANSWER OR 90 DAYS FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.  
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE MANAGING JUDGE ASSIGNED IS: HON KEITH E. LYNOTT

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002  
AT: (973) 776-9300 EXT 56908.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.  
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE WITH R.4:5A-2.

ATTENTION:

ATT: YONGMOON KIM  
KIM LAW FIRM LLC  
411 HACKENSACK AVE STE 701  
HACKENSACK NJ 07601

ECOURTS